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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Computer III Remand Proceedings:)	CC Docket No. 90-62
Bell Operating Company Safeguards;)	
and Tier 1 Local Exchange Company)	
Safeguards)	
)	
Application of Open Network)	
Architecture and Nondiscrimination)	CC Docket No. 92-256
Safeguards to GTE Corporation)	

SUPPLEMENTAL COMMENTS OF BELL ATLANTIC¹

These comments supplement Bell Atlantic's filing on the initial April 11 due date, prior to the Commission's *sua sponte* extension of time.²

In the initial comments, Bell Atlantic cited a recent national survey by Louis Harris and Associates and Dr. Alan Westin showing that customers expect an integrated company to be able to market all of its products and services together.³ That study has subsequently been published and is referenced in a trade publication, the relevant pages of which appear in Attachment 1.⁴ It shows that nearly two-thirds of the public

¹ The Bell Atlantic Telephone Companies ("Bell Atlantic") are Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; and Bell Atlantic-West Virginia, Inc.

² Order, DA 94-331 (rel. April 14, 1994).

³ Comments of Bell Atlantic at 9-10 (filed April 11, 1994).

⁴ "New Harris Survey Sheds Light on FCRA Issues," *Privacy & American Business*, Vol. 1, No. 3 at 7, 13-14 (1994).

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finds it acceptable for one subsidiary of a firm to share customer information with another subsidiary in order that the second can solicit customers for its products or services.⁵

Attachment 2 contains quotes and paraphrased statements showing that Bell Atlantic's customers have similar expectations to those polled in the national survey. These quotes and statements are from customer calls to Bell Atlantic's business offices and comments written on CPNI notification response forms. They show that Bell Atlantic's customers expect Bell Atlantic to be able to offer all of its products and services on an integrated basis, and that they strongly desire that result.⁶ Artificial restrictions on access to customer information are inconsistent with these expectations.

These customer quotes were obtained after the recent publicity regarding merger and acquisition activity in the telecommunications industry. None of them distinguished between services and products developed in-house, as opposed to those acquired by merger or acquisition. Accordingly, there is no reason to assume any different customer expectations based on the genesis of the service or product, and no reason to reconsider the customer proprietary network information ("CPNI") rules to take account of merger activity.

⁵ *Id.* at 14.

⁶ Some, but not all, of the quoted customers had CPNI-restricted records.

Also included in Attachment 2 are statements from customers and from Bell Atlantic marketing personnel with customer contact responsibilities that demonstrate frustration and anger at the difficulties they face in dealing with Bell Atlantic as a result of the CPNI rules. Customers do not understand why there should be any distinction in marketing basic network services, enhanced services (a concept that most fail to understand) and customer premises equipment and are confused as to the impact of restricting or not restricting records. They particularly express their displeasure when they must talk with more than one service representative to obtain answers to questions about enhanced services or to place basic service orders if their records are restricted.⁷

⁷ Calls to Bell Atlantic business offices are randomly distributed to representatives who may sell enhanced services (and, therefore, may not have access to restricted CPNI) and those who have access to all CPNI (and, therefore, may not sell enhanced services).

These statements show that the existing CPNI rules do not benefit customers -- they only help competitors by eliminating the benefits of enhanced services integration. More onerous rules will simply add to customer inconvenience and confusion.

Respectfully submitted,

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May 5, 1994

PRIVACY AMERICAN BUSINESS

IN DEPTH

Financial Services and Consumer Privacy

New Harris Survey Sheds Light on FCRA Issues

Spring 1994 brings rain, crocuses, and debates in Congress over revision of the Fair Credit Reporting Act of 1970. (See our accompanying article.) Observers of FCRA struggles will find very interesting the trends reported in a new (January 1994) Louis Harris national survey that probed the public's views on credit reporting and FCRA issues — especially those findings that the public sees major benefits in having uniform federal rules for credit reporting and also approves sharing of customer information among affiliates of a company.

High Approval of Credit Reports

Any balanced judgment about the reasonableness and social utility of collecting particular personal information rests on how valuable the product of such activity is seen as

being to the individual involved and to the larger society. If the uses are not valued, there is little justification for requiring disclosure or for trying to work out acceptable fair information practices safeguards.

The 1994 Harris survey probed public perceptions on requiring credit checks. Repeating questions asked in 1990 (*The Equifax Report on Consumers in the Information Age*, by Louis Harris & Associates and Dr. Alan F. Westin), the 1994 survey found that 92% of the public agree that "when people want to borrow money, the company giving them credit should be able to check on their credit records." Similarly, 92% believe that "when people apply for a credit card, the company issuing the credit card should be able to check on their credit and credit card records."

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Innovative Policies Casefile: Privacy Issues at American Express

American Express, founded in 1850, is a global financial services firm with 2,200 offices in 130 countries. It has 65,000 employees worldwide and generated \$10.5 billion in operating revenues in 1993. Since the 1950's, American Express (AE) has gone through three eras of organizational development that bear directly on consumer privacy issues:

■ **AE 1950-1960:** AE launched its travel and entertainment credit card in 1958; moved into computerization heavily in 1962-1968; expanded into publishing of travel magazines; and began acquiring businesses in other fields (e.g., Fireman's Fund Insurance

Co., a property-casualty insurer). During this era, computerization of sensitive credit card information and its greater accessibility became part of the growing public concern about "data bank threats" to privacy.

In response, AE ~~announced~~ ~~the release of~~ ~~customer data to third parties,~~ ~~and in 1974 the first U.S. charge card firm to provide its~~ ~~Cardmembers with an annual opt out from marketing uses of the~~ ~~Cardmember's name and address.~~ AE also supported strong privacy protection policies in testimony before the U.S. Privacy Protection

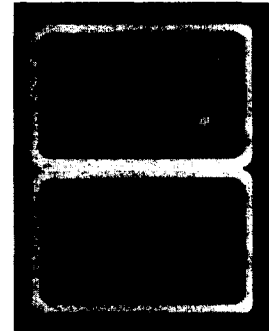
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FCRA Survey

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Such high acceptance of credit reports for granting loans and issuing credit cards represents very broad endorsement of the credit reporting process for consumer credit.

The 1994 Harris survey then set out to probe the public's views on the value of credit reports to consumers themselves. It asked:

"If businesses extending credit could not obtain accurate and relevant national credit bureau reports about a consumer's record of paying bills, how likely do you think it would be that ...

1. many businesses would cut back on extending credit, to only the best customers?" 83% of the public felt this would happen. (15% did not, with 2% not sure).

2. the cost of credit would go up, to cover increases in bad debts." 89% of the public believed this would happen (10% disagreed, with 1% not sure).

51% of Americans believe their consumer privacy rights are "adequately protected" today...

3. it would probably take several weeks rather than several days to get a loan approved." 83% saw this as likely (15% disagreed, with 3% not sure).

4. many businesses would ask for the loan to be secured." 85% felt this would happen (11% disagreed and 3% were not sure).

These answers show that more than 8 out of every 10 Americans see the current credit reporting system as directly beneficial to consumers—facilitating the availability of consumer credit, keeping credit costs down, speeding up credit decisions, and opening up credit opportunities to many who could not offer security for loans. It is hard to imagine a more positive public endorsement of the American credit granting process today. In addition, these views are held by large majorities of all demographic groups covered in Harris surveys—blacks, hispanics, and whites; young, middle-aged, and

older persons; females and males; respondents from across the educational spectrum; at all income levels; in cities, suburbs, and rural areas; and by conservatives, moderates, and liberals.

Rising Confidence About Consumer Rights

Results of Harris Consumer Privacy surveys in 1990 and 1991 showed that rising majorities of the public were worried about their privacy rights in credit reporting. When asked whether they agreed or disagreed with the statement, "My privacy rights as a consumer in credit reporting are adequately protected today by law and business practice," 51% of the public *disagreed* in 1990, and 58% did *not* feel so protected in 1991. Put another way, only 46% of Americans in 1990 and an even smaller 37% in 1991 believed that their consumer privacy rights were being well protected.

When this question was repeated on the Harris survey, Consumers and Credit Reporting 1994, a major shift was recorded. Fifty-one percent of the public now believe their consumer privacy rights are "adequately protected today by law or business

practice." Forty-six percent disagree. The negative judgment is down 12% from 1991.

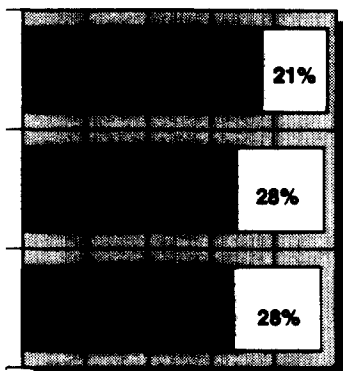
Since the federal law on credit reporting has not been amended since 1991, this shift must rest on public perceptions that industry practices in privacy protection are improving; or that federal and state agencies administering existing statutes have been doing a better job; or, a growth in the perceptions of about 12% of the public that both trends have been taking place.

Consumers and FCRA

A narrow majority of the public—53%—say they have heard about "consumer issues involving the use of credit reports and operations of credit bureaus." But only one American in four—25%—say they have "heard anything about proposed legislation in Congress to change federal rules on credit reporting." (The question spelled out what the proposed legislation would cover.) The demographic group patterns on knowledge about FCRA reform followed standard "knowledge of public affairs" divisions: knowledge is highest among the better educated, higher income,

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Public Sees Benefits In One Federal Law For Credit Reporting



■ Having One Federal Law □ Allowing Additional State Laws

Source: Louis Harris and Associates Survey Conducted for MasterCard International and VISA, USA 1994

FCRA Survey

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and middle-aged Americans (30-49) and lowest among the lowest educated, lowest income, and the youngest and oldest respondents.

FCRA and Federal Preemption

Whether an area of public policy should be governed by federal rules or be subject to varying state legislation is an issue as old as the Republic and as current as the computer age. Rationally, federal rules seem wise

**very high majorities
approve sharing cus-
tomer information
among corporate
affiliates**

when problems or activities are national in scope, involve multi-state transactions or when citizens believe they should be equally treated throughout the U.S. State discretion is well-founded when novel social policies are to be experimented with locally before attempting national rules, when distinct regional or state cultural identities are involved, or when the adopted federal rules seem highly limited and state variations would create few hardships.

A central issue in Fair Credit Reporting Act reform has been whether uniform federal rules should be set for the three national consumer reporting companies and the nationwide credit grantors they serve or to allow state credit reporting laws to set different regulations. To test public views, the 1994 Harris survey described this choice and asked respondents which approach they thought would most likely produce various consumer benefits presented to them. (The question read: "American consumers obtain all kinds of loans, including home mortgages, credit cards, and retail credit from creditors who lend to consumers located throughout the nation. This system relies on credit bureau reports that provide credit grantors with information on whether individual consumers pay their bills and loans on time. Congress is currently considering legislation to update the 1970 federal law on consumer rights in

credit reporting. Which approach do you think would be likely to produce [the effect stated] — having one federal law regulating credit reporting with national rules OR allowing various states to pass additional laws with different rules?" The two answers were rotated each time, to avoid any bias in the order of presentation.)

■ The first effect tested was "more accurate credit reports." Sixty-seven percent of the public felt that one federal law would produce more accurate credit reports, while 28% saw allowing additional state laws as likely to have that effect.

■ The second effect tested was "less confusion for consumers." Three out of four respondents - 76% - said that federal rules would have that effect to 21% choosing state laws.

■ The third effect tested was "a more efficient way for consumers to get credit." Sixty-eight percent of the public felt that federal rules would more likely have this effect than varying state laws (chosen by 28%).

Demographically, every standard group (gender, race, age, income, education, etc.) recorded a majority in favor of federal pre-emption. Younger Americans (18-29) and people with higher incomes were even higher than the general public in choosing uniform federal rules as likely to create all three consumer benefits. Especially interesting is the fact that the 56% of Americans who said they had applied for any form of credit in the past two years were much higher in choosing federal rules to achieve the three consumer benefits than the 44% who had not used the credit system in the past two years.

Information-Sharing and the FCRA

Another important issue in FCRA reform involves sharing of customer information among affiliates of the same company for the purpose of offering the customer products or services of other subsidiaries. A Harris question read: "Now, I'd like to ask you some questions about offers corporations often make to consumers. For example, one subsidiary or company within a corporate family may want to mail an offer of products or services to customers of another subsidiary or company within the same corporate family, because they

believe the customer would be interested in those products or services. Before extending the offer, information about the customer is shared with the subsidiary making the new offer. How acceptable is this use of customer information among subsidiaries of the same corporate family to make offers of services or products?" Sixty-three percent of the public felt it acceptable for "subsidiaries of the same corporate family" to share customer information "to make offers of services or products."

When asked about specific examples, 71% said it is acceptable to offer a credit card to customers who have a mortgage with one of the other subsidiaries; 77% to offer a credit card to customers who have a checking account with one of the other subsidiaries; 70% to offer insurance to customers who have a loan with one of the other subsidiaries; and 71% to offer mutual funds to customers who have a checking account or loan with one of the other subsidiaries.

Again, strong majorities of all demographic groups supported such intra-company information sharing. Blacks, hispanics, younger (18-29) and middle-aged (30-49) Americans, and higher-income groups favored

**every demographic
group (gender, race,
age, income, education,
etc.) favors federal pre-
emption.**

such information-sharing at higher levels than the general public.

Useful Input in FCRA Debates

The 1994 Harris survey results should be a useful input to congressional staffs and legislators, interest groups and the media following FCRA debates this spring. While these issues of federal preemption and intra-company information sharing are complex, the survey offers persuasive data on how the American public reacts to the consumer privacy interests involved in FCRA reform.

See page 20 to order a copy of the Survey Report, *Consumers and Credit Reporting 1994*.

ATTACHMENT 2

CPNI Rules Do Not Benefit Customers

The following is a sample of quotes and paraphrased statements from Bell Atlantic's customers that relate to this proceeding. The first section shows that customers expect Bell Atlantic sales personnel to be able to market the full range of Bell Atlantic products and services. The second section shows that many customers are confused and angered by the inconvenience caused by the Commission's existing CPNI rules. The business office procedures that cause customer transfers to more than one representative were prompted by the requirements of the Commission's CPNI rules.

Customer Expectations

1. "[The people at] Bell Atlantic are the experts. Have them look at my business and provide me with the services that fit my needs."
2. Bell Atlantic "should objectively assess your present and future needs and recommend what is appropriate."
3. "The company should look for ways to improve my services to my customers with [a full range of] telecommunications products.... Think of the customer's customer."
4. "Marketing reps. should tell me what is best and most economical to meet my needs."
5. "Marketing reps. should tailor the products/services they offer for the customer's needs."
6. "Marketing reps. should contact customers periodically to check on how things are going, inquire about new needs and inform them about new services that may be coming up."

7. "The company should be proactive in contacting customers about services [and products]."
8. "We'd like to be able to pick those options that would be good for our business [rather than having to pick among all of the company's offerings]."
9. "I don't want to have to keep making decisions; give me a service and a price and be done with it."
10. "I want the vendor to put a complete package together."
11. "[Bell Atlantic should] give you a personal service representative, one person responsible for [all services in] your account. If you have a problem or a concern, you can get on the phone and he's going to be able to readily solve it."

Confusion and Anger

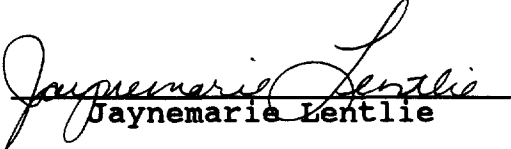
1. Customer annoyed and angered when sales rep. (authorized to sell CPE and enhanced services) could not access the customer's CPNI-restricted records to help remedy a repair problem.
2. Customer with CPNI restriction who called account rep. for recommendations about best range of solutions (including CPE and enhanced services) to meet business problem was confused that rep. could not access records for that purpose.
3. "It would make sense to me you should be able to customize the features by line, and [there should be] some way to easily address that with Bell Atlantic if your needs change without going through some labyrinth [of different personnel or] voice messages."
4. "The Rep. who answered the phone couldn't give me rates for Answer Call. I didn't like being transferred."
5. "I think the FCC ruling about CPNI is ridiculous and it needs to be changed."
6. "I called to get information on voice mail, and I had to be transferred.... I'd also called before and the Rep. who answered the phone couldn't answer my questions that time either."
7. "It takes a lot of time to fill out the [CPNI authorization] form in my bill, find a stamp, and mail it."
8. "I don't understand [the CPNI notification letter]. Restrict me to the max."

The following are statements from Bell Atlantic Service Representatives reporting on the many complaints they have received about CPNI:

1. "Customers just don't understand CPNI."
2. "Customers tell us they don't like to be transferred, they just want to talk to one person who can look at all the records."
3. "Customers think CPNI means they'll never get another solicitation call from anyone about anything."
4. "This is no different than any other business. If a customer asks you a question, you want to look in their records to answer them."
5. "If we do not have access to a customer's record, how can we improve their services and reduce their costs? We do that all the time, change something they have to something better based on something we saw in their records."
6. "Most customers have little or no record of their services. They rely on us to tell them what they have."
7. "It's insanity that you can't look at a customer's record when they ask you a question. No other company in it's right mind operates that way."

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Supplemental Comments of Bell Atlantic" was served this 5th day of May, 1994, by first class mail, postage prepaid, on the parties on the attached list.


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